

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION**

**Master File No. 12-md-02311
Honorable Marianne O. Battani**

In Re: All Cases

**THIS DOCUMENT RELATES TO:
All Actions**

NISSAN ENTITIES' JOINDER IN OBJECTION FILED BY CERTAIN SSEs

The Nissan Entities, including Nissan Motors Acceptance Corp., hereby join in the objection filed by Certain SSEs except as to "Issue Presented No. 4." The Nissan Entities do not object that the Special Master took the motion to compel under submission to permit the Parties and the Nissan Entities to exchange information relating to the nature, accessibility and burden of producing documents. The Nissan entities join in the remaining objections, but during the pendency of these objections, and on a voluntary basis, the Nissan Entities will attempt to work with the Parties to provide foundational information as to Nissan's procedures, and information as to the nature, accessibility and burden of production of the materials sought by the Parties' subpoena, provided that reasonable terms can be negotiated. The Nissan Entities reserve all objections to the subpoena at issue herein.

Nissan Motor Acceptance Corp. also joins the objections filed by the Non-Core SSEs. It will nevertheless meet and confer with the Parties in relation to their requests for information.

DATED: May 4, 2016

Respectfully submitted,

NISSAN NORTH AMERICA, INC.
NISSAN DESIGN AMERICA, INC.
NISSAN TECHNICAL CENTER NORTH
AMERICA, INC.
NISSAN MOTOR ACCEPTANCE
CORPORATION

By: /s/ Anthony J. Anscombe

One of Their Attorneys

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